

IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

Emily Doe)	Civil Action No.: 4:20-cv-04445-SAL
)	
Plaintiff)	
vs.)	
)	
American University of Antigua Inc.,)	REQUESTS FOR PRODUCTION TO
)	DEFENDANT ON PERSONAL
)	JURISDICTION
Defendant)	
)	

**TO: ANGUS H. MACAULAY, ESQUIRE AND BRITTANY CLARK, ESQUIRE,
ATTORNEYS FOR DEFENDANT:**

DEFINITIONS

Plaintiff incorporates by reference those Definitions set forth in her First Amended Special Interrogatories to Defendant served this date.

1. Produce application documents for all applicantsⁱ to AUA during the relevant time period who listed any South Carolina address as a permanent or temporary address at any time in their application and/or enrollment with AUA.
2. Produce documents submitted by all graduates of AUA during the relevant time period reflecting any South Carolina address as a permanent or temporary address at any time during their application and/or enrollment with AUA. (same endnote).
3. Produce documents submitted by any student of AUA during the relevant time period reflecting a student who began and/or completed a rotation, affiliated or nonaffiliated clinical clerkship at any health care facility located in South Carolina. As to each, provide sufficient documentation to identify the name and address of the health care facility.
4. Produce all communication between AUA and/or Manipal and any health care facility located in South Carolina during the relevant time period regarding or inquiring about

possible arrangements for any AUA student to perform rotations, clinics, seminars, or courses of study of any kind as part of their coursework at AUA, even if no AUA student ever participated in rotation, programs, clinics, seminars or courses of study in the health care facility with which AUA had communication.

5. Produce documentation documenting any and all officers and/or employees of AUA including but not limited to faculty who have now or have had at any time during the past ten years, any education or professional affiliation of any kind with any institution in South Carolina, including but not limited to Dr. Robert Mallin's association with the Medical University of South Carolina in an associate or other academic position, his licensure by the South Carolina Board of Medical Examiners, his medical degree from the Medical University of South Carolina as well as Dr. Kimberly Mallin's licensure by the South Carolina Board of Medical Examiners (License #21724) and any related affiliation with South Carolina.
6. Produce documents which reflect real property interests, including leasehold interests, by any officers and/or employees of AUA held in South Carolina real property, including but not limited to Dr. Robert Mallin's and Dr. Kimberly N. Mallin's current and/or prior ownership of real estate identified in Charleston County, South Carolina as TMS # 532-15-00-071 (identified more specifically as Unit D, Building 3 of the Simmons Pointe Horizontal Property Regime and/or 1551 Ben Sawyer Blvd United 3D, Mt. Pleasant SC, the property tax receipt for 2021 which is attached as **Exhibit A**) and real estate identified in Charleston County as TMS # 571-12-00-113 as evidenced by a Deed recorded at Book E373, Page 847 and which transferred by a Deed recorded at Book 572, Page 866.

7. Produce any and all communications between any officer or agent of AUA with Dr. Robert Mallin or any placement agent or agency with which he may have been associated at any time before he became affiliated in any capacity with AUA.
8. Produce any and all communications between any officer or agent of AUA with the Medical University of South Carolina, including but not limited to Dr. Robert Mallin, at any time during the relevant time period which relate to medical school education at either AUA or the Medical University of South Carolina.
9. Produce any and all South Carolina state tax returns, if any, filed by Dr. Robert Mallin and/or Dr. Kimberly Mallin during the relevant time period. Please redact any personal identifying information.
10. Produce with the transmittal address to which they were transmitted any and all K-1s, 1099s, or other income documentation issued to Dr. Robert Mallin and/or Dr. Kimberly Mallin during the relevant time period.
11. Produce documents which reflect whether a mortgage dated May 29, 2001 from Dr. Robert Mallin to Carolina First Bank and/or any successor or servicer thereof recorded at Charleston County Book 4411, page 666 and Book 373, Page 613 is satisfied, and if so, identify or produce documents which reflect the satisfaction. If the mortgage is not satisfied, identify or produce documentation which reflects the active servicer of said mortgage. Do not reveal any account numbers and redact any personal identifying information (other than names) on documents produced.
12. Produce documents which reflect whether a mortgage dated January 24, 2006 recorded at Charleston County Book J571 Page 101 – 120 from Robert Mallin and Kimberly N. Mallin to Bank of America N.A. is satisfied, and if so, identify or produce documentation which

reflects the active servicer of said mortgage. Do not reveal any account numbers and redact any personal identifying information (other than names) on documents produced.

13. Produce all emails or transmittals received by licensure@auamed.org during the relevant time period that have listed South Carolina as a state from which any graduate or post-graduate has requested documentation, as set forth on **Exhibit B** or any prior document which served the same purpose for earlier graduates.
14. Produce documents sufficient to identify all dates within the relevant time period on which Dr. Robert Mallin or Dr. Kimberly Mallin performed services for or to benefit AUA and/or its students, or in their capacities as faculty or administration for AUA from any location in South Carolina, including Teams or Zoom calls from a computer or personal communication device located in South Carolina.
15. Produce documents sufficient to identify all ports of call, cities or countries visited by the Semester at Sea program for which Craig Hauser served as Dean of Students in 2013 or at any other time within the relevant time period.
16. Provide documentation to identify by city, state and name of the location at which Plaintiff was assigned to perform academic studies as an AUA student at the time of the transmittal of the email of September 28, 2020.
17. Provide documents to identify all individuals who attended or participated in the Microsoft Teams Meeting held on September 21, 2020 at 4:00 pm by Rachel Osborne on September 17, 2020., including clerical and/or technical staff. As to each, provide documents to identify the location at which all such individuals were believed to be physically located at the time of the September 21, 2020 Teams meeting.

18. Provide all written communications between any officer or employee of Defendant and any officer, employee or Board member of Voorhees College at any time since January 2016.
19. Provide documents showing all email and text communication between any officer or employee of AUA and Dr. Robert Mallin and/or Dr. Kim Mallin at any time during the calendar years 2019 and 2020.
20. Produce copies of the audio or video of any Microsoft Teams or other virtual platform meetings between any officer or employee of AUA and Dr. Robert Mallin and/or Dr. Kim Mallin at any time during the calendar years 2019 and 2020.
21. Provide documents which contain any and all communications between any officer and/or employee of AUA and Grand Strand Medical Center, and produce any agreements, contracts, or documents reflecting an association for any purpose between AUA and Grand Strand Medical Center during the relevant time period.
22. Provide documents related to any and all affiliations between AUA and any hospital in the United States affiliated with or under the management of HCA or any management company of HCA at any time during the relevant time period.
23. Produce any and all written communications between Dr. Robert Mallin and any person or department with Grand Strand Medical Center in Myrtle Beach South Carolina at any time during 2019 and 2020.

Respectfully submitted,

s/ Desa Ballard

Desa Ballard (ID# 1179)

Harvey M. Watson III (ID# 9271)

BALLARD & WATSON

226 State Street

West Columbia, SC 29169
Telephone 803.796.9299
Facsimile 803.796.1066
desab@desaballard.com
harvey@desaballard.com

ATTORNEYS FOR PLAINTIFF

August 20, 2021

I, Beth Cogan, an employee of Ballard & Watson,
Attorneys at Law, certify that I have this date served
a copy of RFP on Personal Jurisdiction
on all counsel of record and Pro Se parties by
Sending a copy properly addressed via email.

Date: 8/20/21 Signed: Beth K Cogan

ⁱ No identities of persons so named will be included in a public court filing, so disclosure is solely for purposes of discovery in this action, and no person shall be identified in this litigation without their consent or in the absence of a suitable protective order.



WELCOME REAL PROPERTY RECORD SEARCH REAL PROPERTY BILL SEARCH PERSONAL PROPERTY SEARCH

MOTOR VEHICLE SEARCH CHECKOUT CONTACT US



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Account Information

Last Update: 3/3/2021 1:23:40 PM

Parcel Number
5321500071

Alternate Number

Property Type
Real

No records found.



Installment Information

Payable Year: 2020/2021 | Bill Number 9100349 | Tax Bill 15666246

Date	Tax	Penalty	Interest	Fees	Total	Status
1/15/2021	\$2,171.24	\$0.00	\$0.00	\$0.00	\$2,171.24	Paid



Assessment Information

Taxing Authority	Gross Tax	Credits	Savings	Net Tax
County				
County Government Bonds	\$126.33	\$0.00	\$0.00	\$126.33
County Government Operating	\$853.25	(\$388.13)	\$0.00	\$465.12
Fund Type Total				\$591.45
Town of Mt Pleasant				
Town of Mount Pleasant	\$718.64	(\$144.90)	\$0.00	\$573.74
Town of Mount Pleasant Bonds	\$95.27	\$0.00	\$0.00	\$95.27
Fund Type Total				\$669.01
Parks and Rec				
Parks & Recreation Operating	\$82.84	\$0.00	\$0.00	\$82.84
Parks & Recreation Bond	\$37.28	\$0.00	\$0.00	\$37.28
Fund Type Total				\$120.12
School Board				
School Board Bond	\$579.88	\$0.00	\$0.00	\$579.88
School Board Operating	\$2,456.21	(\$2,456.21)	\$0.00	\$0.00
Fund Type Total				\$579.88
RES SOLID WASTE USER FEE				
RESIDENTIAL USER FEE	\$99.00	\$0.00	\$0.00	\$99.00
Fund Type Total				\$99.00
TTC				
Trident Tech Bonds	\$14.50	\$0.00	\$0.00	\$14.50
Trident Technical College Ops	\$37.28	\$0.00	\$0.00	\$37.28
Fund Type Total				\$51.78

Town of Mt Pleasant Res SW Fee

Town of Mt Pleasant Residential SW Fee	\$60.00	\$0.00	\$0.00	\$60.00
Fund Type Total				\$60.00
Total Net Tax				\$2,171.24

✓ Payment History

LAST PAID

12/23/2020

AMOUNT PAID

\$2,171.24

RECEIPT NUMBER

ML136464



RETURN



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**AMERICAN
UNIVERSITY
of ANTIGUA**

COLLEGE OF MEDICINE



Post-Graduate Documentation Request Form

Return to: licensure@auamed.org

All students who need assistance with state medical licensing and documentation for post-graduate endeavors such as residency programs must fill out this form. Return to licensure@auamed.org. Remember – We cannot process any state licensing or permit forms until your degree has been awarded by the **Office of the Registrar**.

Official Name:	Student ID:
Date of Birth:	Social Security #:
Email Address:	Phone Number:

State(s) where you are applying for licensure: _____

Type of licensure permit (full or training): _____

If applying for program or position at a hospital, fill out the below:

Hospital name: _____

Specialty: _____

Documents(s) needed from AUA: _____

If you require an official transcript, diploma or MSPE, please submit payment online at cashnet, and send your receipt along with this form. *If you no longer recall your log-in credentials for cashnet, please see the next page.*

Other information needed (i.e. dates of enrollment, gaps, etc.): _____

Name and address, mailing or email, of intended recipient:



Please read the following before submitting this form to licensure@auamed.org

Q: When will my request be completed?

A: 5-10 business days. All requests are processed first come, first serve.

Q: Does AUA report any breaks in my medical education?

A: We work with the Registrar Department to determine breaks per your ECFMG certification. If AUA reports them to a particular licensure board and you do not, you could be subject to a penalty for nondisclosure. If your licensing application requires attendance or break dates, please do not submit any information until we have sent you the relevant content.



**AMERICAN
UNIVERSITY
of ANTIGUA**

COLLEGE OF MEDICINE

Q: I don't know what state licensing forms are needed. What do I do?

A: The FSMB website provides information regarding each state's requirements for licensure and permits. Please refer to the Residency Preparation Manual for more information. In addition, you may consult your residency program coordinator.

Q: How can I pay for transcript, diploma or MSPE fees?

A: Most students can now conveniently pay their transcript fees online via credit card using the new HigherOne/CASHNet link shown here.

Sign on credentials for HigherOne/CASHNet have already been established for students:

Login Username = AUA Student ID (Ex:57103)

Login Password = Last name (First letter UPPER case) + last four digits of student ID

Example: John Smith

Login Username = 123456

Login Password = Smith3456

PLEASE NOTE: Students on Bursar Hold with past due balances will not be able to pay online and are directed to contact New York Bursar by phone or email (1-800-509-4218, option 6, email bursar@auamed.org). Past due balances must be cleared before purchasing a Comp Exam.